

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

Gillian Jordan, aka Gillian Margaret Jordan-De  
Verteuil,

Debtor.

Chapter 11 (Subchapter V)

Case No.: 22-40568-nhl

Adv. Pro. No.: 1-23-01064-nhl

Gillian Jordan aka Gillian Margaret Jordan-De  
Verteuil,

Plaintiff,

v.

Doug Naidus,  
World Business Lenders, LLC,  
Worldwide Land Transfer Inc.  
WBL SPE III, LLC,  
The Bank of Lake Mills, and  
John Does 1-3,

Defendants.

**NOTICE OF MOTION TO  
DISMISS ADVERSARY  
COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the annexed Motion of Defendants Doug Naidus, World Business Lenders, LLC, and WBL SPE III, LLC (collectively, the “WBL Defendants”) dated September 15, 2023, and upon all pleadings and proceedings heretofore had herein, Parker Ibrahim & Berg LLP, counsel for the WBL Defendants, shall move before the Honorable Nancy Hershey Lord, U.S.B.J., United States District Court, Eastern District of New York, at 271-C Cadman Plaza East, Suite 1595, Brooklyn, New York on October 17, 2023 at 10:00 a.m. for an Order: (i) pursuant to Federal Rules of Civil Procedure 12(b)(1) and (6), dismissing the RICO Adversary Complaint & Objection to Proof of Claim by Recoupment, filed by Plaintiff Gillian Jordan a/k/a Gillian Margaret Jordan-De Verteuil on August 13, 2023 as Adversary Proceeding

No. 23-01064-nhl, and; (ii) for such other and further relief as the Court deems just and proper (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the WBL Defendants shall rely upon the accompanying Memorandum of Law in Support of the WBL Defendants’ Motion to Dismiss of James P. Berg, Esq., with accompanying exhibits.

**PLEASE TAKE FURTHER NOTICE** that the Motion’s hearing shall not be held in person but shall be held telephonically or by video. Those intending to appear at the hearing must register with eCourts Appearances no later than two (2) days prior to the hearing. The phone number or video link for the hearing will be emailed to those that register with the eCourts Appearances in advance of the hearing. Instructions for registering with eCourts Appearances can be found at <https://www.nyeb.uscourts.gov/node/2126>. If you do not have internet access or are otherwise unable to register with eCourt Appearances, you may call or email Judge Lord’s courtroom deputy for instructions at (347) 394-1854, [nhl\\_hearings@nyeb.uscourts.gov](mailto:nhl_hearings@nyeb.uscourts.gov).

Dated: New York, New York  
September 15, 2023

**PARKER IBRAHIM & BERG LLP**  
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Doug Naidus, World Business Lenders,  
LLC, and WBL SPE III, LLC

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